

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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*Counsel to the Plan Administrator*

In re:

BED BATH & BEYOND, INC., *et al.*,<sup>1</sup>

Debtors.

Case No. 23-13359 (VFP)

Chapter 11

Subchapter V: ☐ Yes ☒ No

Hearing Date: November 14, 2023

Judge: Vincent F. Papalia

**ADJOURNMENT REQUEST**

1. I, Paul J. Labov:  
☒ am the attorney for: the Plan Administrator.  
☐ am self-represented.

and request an adjournment of the following hearing for the reason set forth below.

- A. Debtors' (I) Omnibus Objection to Certain Tax Claims and (II) Motion to Determine Tax Liability and Stay Proceedings [Docket No. 2156] **with respect to: Bexar County Appraisal District [Docket No. 2432]; Certain Texas Taxing Entities [Docket No. 2483]; Texas Taxing Authorities [Docket No. 2492]; and the McCreary Entities [Docket No. 2497] only.**

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<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

- B. Debtors' Motion to Determine Tax Liability and Stay Proceedings [Docket No. 2157] **with respect to: Taxing Districts Collected by Randall County [Docket No. 2484]; and Taxing Districts Collected by Bell County [Docket No. 2487] only.**
- C. Debtors' (I) Second Omnibus Objection to Certain Tax Claims and (II) Motion to Determine Tax Liability and Stay Proceedings [Docket No. 2180] **with respect to: Treasurer/Tax Collector for the County of Orange [Docket No. 2476]; Treasurer/Tax Collector for the County of San Mateo [Docket No. 2477]; Treasurer/Tax Collector for the County of San Diego [Docket No. 2478]; Treasurer/Tax Collector for the County of San Bernardino [Docket No. 2481]; County of Kern Treasurer – Tax Collector [Docket No. 2482]; Auditor-Controller-Treasurer-Tax Collector for the County of San Luis Obispo [Docket No. 2503]; and Sacramento County Tax Collector [Docket No. 25123] only.**
- D. Debtors' Motion to Determine Tax Liability and Stay Proceedings as to Certain California Taxing Authorities [Docket No. 2181] **with respect to: Ventura County Tax Collector [Docket No. 2469]; Alameda County Tax Collector [Docket No. 2470]; Treasurer/Tax Collector for the County of Contra Costa [Docket No. 2479]; Santa Clara, LA, Fresno, and Riverside Counties [Docket No. 2491]; County of Sonoma Tax Collector [Docket No. 2504]; Treasurer/Tax Collector for the County of Santa Cruz [Docket No. 2505]; and Placer County [Docket No. 2673] only.**

Current hearing date and time: November 14, 2023 at 10:00 a.m. (ET)

New date requested: The parties request that the hearing be adjourned for 60 days.

Reason for adjournment request:

- A. The parties are in the process of attempting to resolve a multitude of tax claims, several of which have already been resolved. In an effort to most efficiently resolve remaining claims, the parties will submit a joint proposed scheduling order providing for the resolution of legal and factual issues.

2. Consent to adjournment:

☐ I have the consent of all parties. ☒ I do not have the consent of all parties (explain below).

- A. The Texas Taxing Authorities (on behalf of their clients) and the Plan Administrator have determined that proceeding in the above manner is in the best interests of the Estates. Although several California claim resolutions are currently being negotiated, no California taxing entity has consented to an adjournment.

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I certify under penalty of perjury that the foregoing is true.

Date: November 9, 2023

/s/ Paul J. Labov  
Signature

**COURT USE ONLY:**

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The request for adjournment is:

- ☒ Granted \*\* New hearing date: January 9, 2024 at 2 p.m. ☐ Peremptory
- ☐ Granted over objection(s) New hearing date: \_\_\_\_\_ ☐ Peremptory
- ☐ Denied

\*\*Any party objecting to the adjournment request may appear at the November 14 hearing to argue why its claim should not be adjourned. The November 14 hearing will be by Zoom.

**IMPORTANT: If your request is granted, you must notify interested parties  
who are not electronic filers of the new hearing date.**

*rev.10/2021*